

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AARON RICHARD GOLUB,

Plaintiff,

- against -

TRANS UNION LLC and NATIONWIDE  
RECOVERY SYSTEMS, INC.,

Defendants.

RECEIVED  
FEB 22 2008  
SOUTHERN DISTRICT COURT  
NEW YORK CITY  
CLERK'S OFFICE

No. 07 CV 6308 (JGK)

NOTICE OF MOTION TO  
ADMIT COUNSEL  
PRO HAC VICE

PLEASE TAKE NOTICE that pursuant to Rule 1.3(c) of the Local Rules of this Court, and upon the annexed Declaration of Jeffrey I. Wasserman, Esq., dated February 20, 2008, including the exhibits attached thereto, the undersigned will move this Court, before the Hon. John G. Koeltl, United States District Judge, United States Courthouse, 500 Pearl Street, Courtroom 12B, New York, New York 10007, at a date and time to be determined by the Court, for an Order admitting Kevin T. Schutte, Esq., *pro hac vice*, as counsel for defendant Nationwide Recovery Systems, Ltd., for the purposes of the above-captioned case.

Dated: New York, New York  
February 20, 2008

Respectfully Submitted,

BRACEWELL & GIULIANI LLP

By:

Jeffrey I. Wasserman (JW-9619)  
1117 Avenue of the Americas  
New York, New York 10036-2714  
T: (212) 508-6100  
F: (212) 508-6101

Attorneys for Defendant Nationwide  
Recovery Systems, Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**AARON RICHARD GOLUB,**

**Plaintiff,**

**- against -**

**TRANS UNION LLC and NATIONWIDE  
RECOVERY SYSTEMS, INC.,**

**Defendants.**

**No. 07 CV 6308 (JGK)**

**DECLARATION OF  
JEFFREY I. WASSERMAN  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

JEFFREY I. WASSERMAN declares, under penalty of perjury, the following:

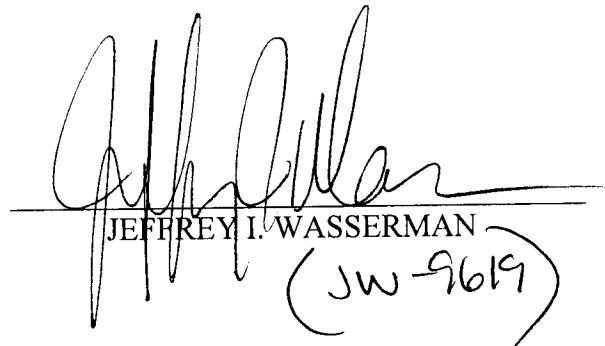
1. I am a member of the Bar of this Court and a partner at the firm Bracewell & Giuliani LLP, counsel for defendant Nationwide Recovery Systems, Ltd. ("Nationwide") in the above-captioned action. I submit this declaration in support of Nationwide's motion, pursuant to Local Civil Rule 1.3(c), to permit Kevin T. Schutte, Esq., to appear, *pro hac vice*, as its counsel for the purposes of the above-captioned action.

2. Kevin T. Schutte is an associate of the firm of Bracewell & Giuliani LLP, resident in the firm's Dallas, Texas office. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Civil Rules of this Court.

3. Attached hereto as Exhibit A is the Declaration of Kevin T. Schutte In Support of Motion to Admit Counsel Pro Hac Vice, sworn to on February 15, 2008. As stated in Mr. Schutte's declaration, and as evidenced by the Certificate of Good Standing annexed thereto as Exhibit 1, Mr. Schutte is a member in good standing of the State Bar of Texas.

4. Nationwide respectfully requests that Kevin T. Schutte be permitted to appear in this case, *pro hac vice*, as its counsel.

Dated: New York, New York  
February 20, 2008



JEFFREY I. WASSERMAN  
(JW-9619)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**AARON RICHARD GOLUB,**

**Plaintiff,**

**- against -**

**TRANS UNION LLC and NATIONWIDE  
RECOVERY SYSTEMS, INC.,**

**Defendants.**

**No. 07 CV 6308 (JGK)**

**[PROPOSED] ORDER FOR  
ADMISSION PRO HAC VICE**

This motion for admission *pro hac vice* in the above-captioned matter is GRANTED.

The admitted attorney, Kevin T. Schutte, is permitted to argue or try this particular case in whole or in part as counsel of record or advocate.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys.

As the above-captioned action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

Counsel shall immediately forward the \$25.00 *pro hac vice* fee to the Clerk of the Court.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**AARON RICHARD GOLUB,**

**Plaintiff,**

**- against -**

**TRANS UNION LLC and NATIONWIDE  
RECOVERY SYSTEMS, INC.,**

**Defendant.**

**No. 07 CV 6308 (JGK)**

**DECLARATION OF  
KEVIN T. SCHUTTE  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

KEVIN T. SCHUTTE hereby declares, under the penalty of perjury, the following:

1. I am a member of the law firm of Bracewell & Giuliani LLP, resident in the firm's Dallas, Texas office, located at 1445 Ross Avenue, Ste. 3800, Dallas, Texas 75202-2711.
2. I submit this declaration in support of Nationwide Recovery Systems, Ltd.'s application for my admission, *pro hac vice*, to practice before this Court and represent Nationwide Recovery Systems, Ltd. for the purposes of the above-captioned case.
3. As shown in the Certificate of Good Standing annexed hereto as Exhibit 1, I am a member in good standing of the State Bar of Texas.

4. I am not presently, nor have I ever been, suspended, disbarred, or otherwise disciplined in any courts or jurisdictions where I have been admitted to practice. There are no pending disciplinary proceedings against me in any State or Federal court.

5. I have obtained a copy of the Local Rules of the Southern District of New York, and am familiar with those Rules.

6. In connection with the above-captioned action, I hereby consent to be subject to the jurisdiction and rules of the State of New York governing professional misconduct.

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: Dallas, Texas

February 15, 2008



KEVIN T. SCHUTTE

# **EXHIBIT 1**

# STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

January 30, 2008

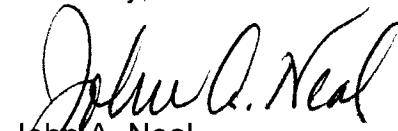
Re: Kevin Thomas Schutte, State Bar Number 24033050

To Whom It May Concern:

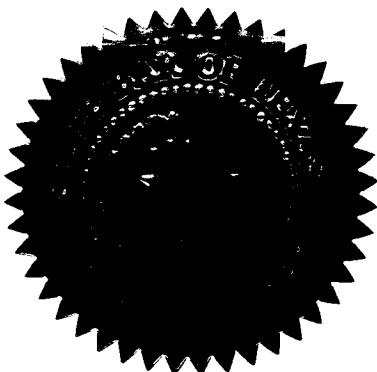
This is to certify that Mr. Kevin Thomas Schutte was licensed to practice law in Texas on November 2, 2001, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No previous disciplinary sanctions have been entered against Mr. Schutte's law license.

Sincerely,

  
John A. Neal  
Chief Disciplinary Counsel

JN/ss

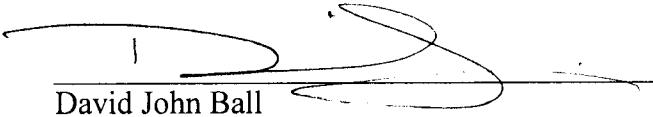


**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of February, 2008, I caused a true and correct copy of the foregoing Notice of Motion to Admit Counsel Pro Hac Vice and accompanying documents to be served on the following persons via first-class mail, postage prepaid:

Nehemiah S. Glanc  
42 East 64th Street  
New York, New York 10065

Timothy P. Creech  
KOGAN TRICHON & WERTHEIMER PC  
1818 Market Street, 30<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19103

  
\_\_\_\_\_  
David John Ball